

### **REMARKS**

In response to the non-final Office Action of August 19, 2008, claims 1, 12, 21, and 29 have been amended to more particularly point out and distinctly claim the invention. Support for the amendment can be found in the specification as originally filed at page 13, line 4 through page 14, line 30. No new matter has been introduced by way of amendment. Applicant has also amended claims 1-4, 6-8 and 29 to replace the phrase "adapted to" with --configured to-- merely for grammatical reasons. No new matter has been introduced by way of amendment.

### **Claim Rejections - 35 USC §102**

At sections 2-3 of the non-final Office Action, claims 1-29 are rejected under 35 USC §102(e) as unpatentable over US patent application publication 2004/0021691, Dostie et al. (hereinafter Dostie).

The Office asserts that Dostie teaches all the features of claims 1-29. Applicant respectfully disagrees.

The independent claims are amended to recite "wherein the characters in the first set of characters are statistically more likely to be selected in successive order than the characters in the second set of characters independently of user input."

To the extent that the anticipation rejection might be applied to the claims, as amended, it is respectfully traversed for the following reasons.

### **The Present Invention**

The present invention as claimed, relates to a device, and related method, for inputting information which comprises a display and a memory, where the memory comprises a first set of characters of a character set, said first set of characters comprising at least two characters, and a second set of characters of said character set, said second set of characters comprising at least two characters, wherein the characters in the first set of characters are statistically more likely to be selected in successive order than the characters in the second set of characters independently of user input. The

present invention is further directed to wherein the display is configured to display, for selection of which character to input, the first set of characters only.

In other words, as amended, the characters in the first set of characters are statistically more likely to be selected in successive order than the characters in the second set of characters regardless of user input. Thus, the characters that have been included in the first set of characters are chosen because of a statistical analysis resulting in a collection of characters that are more likely to be selected in successive order than the characters that are included in the second set of characters. As disclosed on page 13, line 11 of the specification as originally filed, such a statistical analysis is, for example, the cryptanalysis of H.F. Gaines in which it is determined that the statistically most common digrams in the English language are: TH, HE, AN, IN, ER, RE, ES, ON, EA, TI, AT, ST, EN, ND, OR, TO, NT, ED, IS, AR, OU, TE and OF. In the claimed invention, the characters in the first set of characters are statistically more likely to be selected in successive order based on such a statistical analysis. Thus, the characters that comprise the first set of characters, and similarly the second set of characters, have been determined by a previously conducted statistical analysis.

#### The Cited Art

Dostie relates to a method, system, and media for entering data in a personal computing device (Dostie, paragraph [0001]), wherein a user can rapidly enter and search for data using a data entry system by entering one or more characters with a pointing device and by using a search list (Dostie, paragraph [0006]). Dostie further teaches that the search list is to be used to dynamically obtain completion candidates (Dostie, paragraph [0007]). Specifically, as a user begins entering characters of a character sequence, a dictionary within the device of Dostie is searched for what are called "completion candidates" that the user may be attempting to input. A set of potential completion candidates is then displayed (Dostie, paragraph [0082]). In other words, as the user forms a character sequence (i.e. a partial text entry), the character sequence is used to search a dictionary for a set of completion candidates that begin with the character sequence. Thus, the user is provided with a set of possible completion candidate choices to complete the character sequence based on a dynamically input

entry by the user. The choices of completion candidates is dependent upon the character sequence input by the user.

At paragraph [0064], Dostie discloses a mechanism for predicting a set (or list) of possible characters that a user is likely to next select from in order to build upon an existing partial text entry. The set of possible characters contains a set of unique characters that are most likely to follow those characters already entered as part of the partial text entry. In contrast, the claimed invention is not based on predicting a set of possible characters based on an existing partial text entry entered by the user.

In other words, according to the claimed invention as amended, the characters in the first set of characters are different from what is described in Dostie, wherein the set (or list) of possible characters that a user is likely to next select from in order to further build upon an existing partial text entry is based upon the characters already input by the user. In the claimed invention as amended, the characters in the first set of characters are statistically more likely to be selected in successive order than the characters in the second set of characters independently of user input.

Furthermore, although Dostie teaches that preference values are predetermined from analyzing a large corpus of text (Dostie, paragraph [0085]), these preference values are associated with completion candidates and by definition the completion candidates depend on partial text entry entered by the user. As a partial text entry is formed, the predicted set of next possible characters are displayed (Dostie, paragraph [0103]). At paragraph [0009], Dostie teaches that the set of completion characters begin with the partial text entry entered by the user: "the partial text entry is used to search a dictionary of completion candidates."

Thus, the completion candidates characters as described in Dostie are related specifically to the characters that have already been selected by the user which is different from the present invention where the first set of characters is statistically more likely to be selected in successive order than the characters in the second set of characters regardless of which characters have or have not been selected by the user. That is, according to the claimed invention as amended, the characters in the first set of characters have been chosen such that the characters in the first set of characters are statistically more likely to be selected in successive order than the characters in the

second set of characters independently of user input. In this sense, the first set of characters (and hence also the second set of characters) may be regarded as a static set of characters, i.e. independent of user input. Contrary to Dostie, in the claimed invention, the contents of the first set of characters does not change (i.e. independent of user input) as a partial text entry is entered by a user.

With regard to the Response to Arguments section of the Office Action, applicant thanks the Office for the comments contained therein, but it is believed that the arguments provided by the Office are moot in view of the claim amendments and reasoning provided herein.

In view of the above reasoning, applicant respectfully submits that Dostie teaches away from the present invention in which characters are ordered in sets of characters according to a statistical model of the language and associated alphabet related to the present character set, independently of user input. Dostie fails to disclose or suggest “wherein the characters in the first set of characters are statistically more likely to be selected in successive order than the characters in the second set of characters independently of user input,” as recited in the independent claims.

Accordingly, applicant respectfully submits that Dostie fails to anticipate the claimed invention as recited in independent claims 1, 12, 21 and 29, therefore applicant requests that the rejection of claims 1, 12, 21 and 29 under 35 USC §102(e) be reconsidered and withdrawn.

Dostie also fails to anticipate dependent claims 2-11, 13-20 and 23-28 at least in view of their dependency from independent claims 1, 12 and 21, which are distinguished over the cited art as discussed above. Accordingly, applicant requests that the rejection of claims 2-11, 13-20 and 23-28 under 35 USC §102(e) be reconsidered and withdrawn.

### **Claim Rejections - 35 USC §103**

At sections 4-6 of the Office Action, dependent claims 6, 17 and 25 are rejected under 35 USC §103(a) as unpatentable over Dostie in view of US patent 7,152,213, Pu et al. (hereinafter Pu). Each of these claims is believed to be distinguished over the cited art in view of their dependency from independent claims 1, 12 and 21, which are believed to be allowable in view of the above reasoning. Pu fails to disclose or suggest the

features of the claimed invention that are lacking in Dostie, namely "wherein the characters in the first set of characters are statistically more likely to be selected in successive order than the characters in the second set of characters independently of user input," therefore Dostie in view of Pu fails to render claims 6, 17 and 25 obvious. Accordingly, applicant respectfully requests that the rejection of claims 6, 17 and 25 under 35 USC §103(a) be reconsidered and withdrawn.

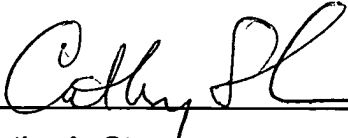
**CONCLUSION**

In view of the foregoing, it is respectfully submitted that the present application as amended is in condition for allowance and such action is earnestly solicited.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "Cathy A. Sturmer", is written over a horizontal line.

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